

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Gene Stilp and	:	
Stephen J. Connolley,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	No. 2:21-cv-03989
	:	
Borough of West Chester,	:	Hon. Gene E.K. Pratter
	:	
Defendant.	:	

Proposed *Voir Dire* of Plaintiffs Gene Stilp and Stephen J. Connolley

Plaintiffs Gene Stilp and Stephen J. Connolley propose the following *voir dire* questions:

1. Does anyone know Gene Stilp or Stephen Connolley?
2. Does anyone reside in the Borough of West Chester?
3. Is anyone employed by the Borough of West Chester?
4. Does anyone have a relative employed by the Borough of West Chester?
5. Does anyone know plaintiffs' counsel, Aaron D. Martin, Esquire, or Sarah E. Straub, Esquire?
6. Does anyone know defendant's counsel, Christine E. Munion, Esquire?
7. Is anyone employed by Chester County government?
8. Does anyone have a relative employed by Chester County government?
9. Is anyone employed as a member of law enforcement or retired from law enforcement?
10. Does anyone have a family member who is employed as a member of law enforcement or retired from law enforcement?

11. Is anyone employed as a firefighter or in a supporting role for firefighting or retired from firefighting or a supporting role? Please indicate even if service is voluntary and without compensation.

12. Is anyone employed in rendering emergency services or in a supporting role for emergency services? Please indicate even if service is voluntary and without compensation.

13. Does anyone believe that flag burning should be illegal?

14. Has anyone been the victim of a crime, including any crime involving fire?

15. Does anyone have a relative who has been the victim of a crime, including any crime involving fire?

16. Has any individual been injured by fire?

17. Does anyone have a relative who has been injured by fire?

18. Does anyone have strong feelings about the 2020 American presidential campaign such that you could not render a fair and impartial decision in a case involving a political protest favoring or opposing Donald Trump or Joe Biden during the 2020 presidential campaign?

19. Has anyone participated in or attended a political demonstration or rally such as a Black Lives Matter march, March for Life, Presidential rally, or a similar event?

20. Do you think that bringing a lawsuit is an appropriate way to enforce an individual's constitutional rights, even if a person is requesting money for violation of a right?

21. Do you think that the government should have the authority to regulate or censor what someone might say about a politician or a proposed policy? To what extent?

22. Are you able to follow instructions to reach a conclusion in this matter based on the presentation of the evidence even if you don't necessarily agree with or like the result?

Respectfully submitted,

METTE, EVANS & WOODSIDE

By: /s/ Aaron D. Martin
Aaron D. Martin
Pa. Attorney I.D. No. 76441
Sarah E. Straub
Pa. Attorney I.D. No. 330748
3401 North Front Street
Harrisburg, PA 17110
(717) 232-5000
admartin@mette.com
sestraub@mette.com

*Attorneys for Plaintiffs,
Gene Stilp and Stephen Connolley*

Date: October 3, 2022.